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2 UNITED STATES BANKRUPTCY COURT
3 SOUTHERN DISTRICT OF NEW YORK
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In Re: Chapter 11
5 LEHMAN BROTHERS Case No. 08-13555 (JMP)
HOLDINGS, INC., et al., (Jointly Administered)
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8 * * * HIGHLY CONFIDENTIAL * * *

9 DEPOSITION OF HUGH McGEE
10 New York, New York
11 Monday, August 10, 2009
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20 Reported by:
FRANCIS X. FREDERICK, CSR, RPR, RMR
21 JOB NO. 24038
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August 10, 2009

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10:00 a.m.

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HIGHLY CONFIDENTIAL deposition of
HUGH McGEE, held at the offices of Jones
Day, 222 East 41st Street, New York, New
York, pursuant to Notice, before Francis
X. Frederick, a Certified Shorthand
Reporter, Registered Merit Reporter and
Notary Public of the States of New York
and New Jersey.

1 H. MCGEE - HIGHLY CONFIDENTIAL

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 Q. Stay up at the top of the chain if
7 we could for a moment because I know there's a
8 lot of people who do something in connection
9 with it. I'm looking at the senior activities
10 either at the table or near the table. Who's
11 involved in getting the transaction done?

12 A. Well, certainly Mike Gelband was
13 there as well.

14 Q. Was Paolo Tonucci involved?

15 A. Yes.

16 Q. What was his role?

17 A. Well, Paolo and Ian Lowitt were
18 both involved around some of the balance sheet
19 type items.

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]